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June 19, 2019

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia SC 29210

**Re: Self – Report Common Digital Platform
PSCSC Docket No. 2011-158-E**

Dear Mrs. Boyd:

I am writing to inform the Commission that certain Customer Information was disclosed in error in between October 31, 2018 and April 29, 2019 pertaining to two Duke Energy Carolinas, LLC (“DEC” or the “Company”) customers under the following circumstances:

1) Duke Energy Corporation (“Duke Energy”) launched My Account as part of the Common Digital Platform in January 2018, to provide a common experience for legacy Duke Energy and legacy Progress Energy online customers. Using My Account, customers can pay bills, enroll in billing programs and view usage for all their electric service accounts across Duke Energy jurisdictions. Customer data displayed in My Account includes the following: email address associated with the account; amount due; customer address and phone number; account number; billing and payment history; usage analysis; payment options and ability to manage banking accounts. However, Personally Identifiable Information is not displayed.

2) Through internal analysis, Duke Energy determined that two DEC South Carolina customer’s My Account information was viewed by other customers as a result of the accounts being incorrectly linked via the Party Model process.

3) Duke Energy conducted an investigation and determined that the incidents occurred as the result of incorrect entry of information in the legacy Duke Energy and legacy Progress Energy source billing systems. Examples include incorrect manual entry of a Social Security Number and incorrect association of accounts when accounts were set up. These irregularities may have existed

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for years within the source systems. The My Account functionality made these data irregularities visible to affected customers, whereas that visibility did not exist with prior customer interfaces. These incorrect entries in the legacy billing systems allowed accounts to be incorrectly linked via the Party Model process. The Party Model process linked accounts based on matching DOB and Social Security Number (SSN), or matching Federal Tax Id (TIN).

4) To help prevent accounts from being incorrectly linked via the Party Model process, Party Model program system changes are being evaluated for implementation. Since these Party Model system changes will take at least a year to implement, an on-going daily monitoring process has been implemented to promptly detect and review accounts that may be incorrectly linked. Additionally, to help prevent data entry errors in the future, DEC's customer contact center execution support team has reinforced their established processes and will continue to do so on a regular basis. Additionally, DEC customer service representatives receive yearly training on the importance of securing Customer Information.

The North Carolina Code of Conduct, approved by the North Carolina Utilities Commission in its September 29, 2016 *Order Approving Merger Subject to Regulatory Conditions and Code of Conduct*, in Docket Nos. E-2, Sub 1095, E-7, Sub 1100 and G-9, Sub 682, and further adopted, as applicable to South Carolina, via the Public Service Commission of South Carolina's Order No. 2016-772, dated November 2, 2016, and amended by the North Carolina Utilities Commission in its August 24, 2018 *Order Granting Motion to Amend Regulatory Conditions* in Docket Nos. E-2, Sub 1095, E-7, Sub 1100 and G-9, Sub 682, and further adopted in Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's Notice of Amendments to North Carolina Regulatory Conditions filed on October 9, 2018, in the above-referenced docket, contains several provisions relating to the disclosure of Customer Information. Customer Information means:

Non-public information or data specific to a Customer or a group of Customers, including, but not limited to, electricity consumption, natural gas consumption, load profile, billing history, or credit history that is or has been obtained or compiled by DEC, DEP or Piedmont in connection with the supplying of Electric Services or Natural Gas Services to that Customer or group of Customers.

If Customer Information is inappropriately disclosed, Section III(A)(2)(k) of the Code of Conduct provides the following:

Should any inappropriate disclosure of DEC, DEP or Piedmont Customer Information occur at any time, DEC, DEP or Piedmont shall promptly file a statement with the Commission describing the circumstances of the disclosure, the Customer Information disclosed, the results of the disclosure, and the steps taken to mitigate the effects of the disclosure and prevent future occurrences.

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In addition, Regulatory Condition No. 14.4 provides that such statements should be filed with the Commission(s). Pursuant to this Regulatory Condition and the above-cited provisions of the Code of Conduct, DEC is filing this letter, in an abundance of caution, to report that Customer Information had been inappropriately disclosed, under the circumstances described above.

DEC takes its obligation to protect Customer Information very seriously and has acted as quickly as possible to rectify this situation. For the foregoing reasons, DEC regrets the error.

Please do not hesitate to contact me if you have any questions or require any further information.

Sincerely,



Heather Shirley Smith

Enclosure

cc: Nanette Edwards, Office of Regulatory Staff
Dawn Hipp, Office of Regulatory Staff
Jeff Nelson, Office of Regulatory Staff